

REMARKS

This application has been carefully reviewed in light of the Office Action dated September 23, 2008. Claims 1 and 3 to 30 are pending in the application, of which Claims 1, 10 to 13 and 22 to 24 are independent. Reconsideration and further examination are respectfully requested.

Claims 11 and 23 have been rejected under 35 U.S.C. § 101 for allegedly being directed to non-statutory subject matter. Without conceding the correctness of the rejection, Applicants have amended Claims 11 and 23 to clarify that they are directed to a computer-readable storage medium. Accordingly, Applicants respectfully request withdrawal of this rejection.

Claims 1, 4, 5, 10 to 12 and 24 to 26 have been rejected under 35 U.S.C. § 102(b) over U.S. Patent No. 5,796,429 (Suzuki). Claims 3, 6 to 9 and 27 to 30 have been rejected under 35 U.S.C. § 103(a) over Suzuki in view of Official Notice. Claims 13 to 15, 22 and 23 have been rejected under 35 U.S.C. § 103(a) over Suzuki in view of U.S. Patent Application Publication No. 2005/0110878 (Dalton). Claims 16 to 21 have been rejected under 35 U.S.C. § 103(a) over Suzuki in view of Dalton and further in view of Official Notice. Reconsideration and withdrawal of this rejection are respectfully requested.

The present invention concerns management of memory devices by an imaging apparatus, such as a camera. In one aspect of the invention, a camera has a plurality of connector units for connecting removable storage medium. A first storage medium connected to the camera stores a plurality of image data and a second storage medium that is connected to the camera stores key image data that are used to retrieve

image data. The camera retrieves image data from the first storage medium that is similar to the key image data read from the second storage medium.

Claims 1, 10, 11 and 12.

Turning now to the claims, representative Claim 1 is directed to an imaging apparatus for recording captured images. The imaging apparatus comprises a plurality of connector units for connecting removable storage medium, respectively; a first storage medium that is connected to a first connector unit among the plurality of connector units and stores a plurality of image data as an object of image retrieval; a second storage medium that is connected to a second connector unit among the plurality of connector units and stores key image data as a retrieve condition that was generated independently from the image data; and a retrieval unit that retrieves image data from the first storage medium that is similar to the key image data read from the second storage medium.

Applicants respectfully submit that the applied reference, namely Suzuki, is not seen to disclose or to suggest all of the features of independent Claim 1. In particular, Suzuki is not seen to disclose or to suggest at least the feature of a retrieval unit that retrieves image data from a first storage medium that is similar to key image data read from a second storage medium.

In the Office Action, it is contended that Suzuki discloses a retrieval unit that is similar to the retrieval unit of Claim 1. Applicants respectfully disagree with such a characterization of the disclosures of Suzuki. In contrast to the present invention, Suzuki discloses that "(t)he control part 11 transmits data to the image generating part 15, controls the image generating part 15, displays information such as a character in the EVF 21 by

controlling the character generator 22, and so on, in accordance with the states of the respective switches 12a, 12b, 13a, 13b, 14a and 14b, the state of connection of the external storage device 9a or 9b connected to the connecting part 10a or 10b, data communicated from the external storage device 9a or 9b, and so on." (See Suzuki, column 4, lines 42 to 51.) Applicants submit that the cited portion of Suzuki discloses nothing more than a conventional data read operation as performed by "the control part 11."

On the other hand, the retrieving unit of Claim 1 retrieves image data from the first storage medium that is similar to the key image data read from the second storage medium, wherein the key image data is used as a condition for retrieving the image data. That is, the retrieving unit uses the key image data to search the stored image data to find image data that is similar to the key image data. Furthermore, Suzuki merely discloses combining a plurality of image data stored in different memories, and storing the combined image data into one of the memories. Suzuki is entirely silent in regard to storing key image data as a retrieve condition that was generated independently from the image data and retrieving image data from the first storage medium that is similar to the key image data read from the second storage medium, as featured in Claim 1.

In light of the deficiencies of Suzuki as discussed above, Applicants submit that amended independent Claim 1 is in condition for allowance and respectfully requests same.

Independent Claims 10, 11, and 12 are directed to a method, a computer-readable storage medium and an apparatus, respectively, substantially in accordance with the imaging apparatus of Claim 1. Accordingly, Applicant submits that Claims 10, 11 and 12 are also now in condition for allowance and respectfully requests same.

Claims 13, 22, 23 and 24.

Claim 13 is directed to an imaging apparatus for recording captured images. The imaging apparatus comprises a connector component that connects an image storage component that stores image data to the imaging apparatus in a removable condition, a retrieve condition storage component that stores retrieve condition data such as a key image or a keyword for use as a retrieve condition when performing image retrieval with respect to the image data stored in the image storage component connected to the connector component, a retrieval component that retrieves the image data that matches or is similar to the retrieve condition data from the image storage component connected to the connector component and an internal storage component that accumulatively stores the image data that was retrieved until there is an explicit delete instruction, even when the image storage component was detached from the connector component or was replaced with another image storage component.

Accordingly, Claim 13 includes similar features to Claim 1 and further includes the feature of an internal storage component that accumulatively stores the image data that was retrieved until there is an explicit delete instruction, even when the image storage component was detached from the connector component or was replaced with another image storage component. In the Office Action, it was contended that Dalton disclosed such a feature. Applicants respectfully disagree with such a characterization of the disclosures of Dalton.

In Dalton, what is disclosed is a “digital camera and methods for managing images captured by the digital camera. According to one such method, a digital camera enables a user to designate a captured image as a favorite image. The user may designate

an image as a favorite image by selecting an option displayed on the digital camera's display screen (e.g., via a user-input panel). Images that are designated as favorite images are down-sampled and then stored in the digital camera's internal memory. An image is said to be down-sampled when its resolution and the amount of data used to encode it are reduced. In this manner, many user-designated favorite images may be accessible by a user at a future time. For example, the favorite images may even be accessible after the corresponding image data has been downloaded to a personal computer (PC), and/or if the memory cards previously used to store the corresponding image data are not available or have had their contents erased or over-written.” (See Dalton, paragraph [0023]).

Arguably, based on the foregoing passage, Dalton discloses that user designated favorite image data is stored in a digital camera's internal memory. The favorite image data may then be saved indefinitely even though other image data is overwritten or deleted. However, nowhere is Dalton seen to disclose or suggest that the “favorite image data” is used as a retrieve condition by a retrieval component that retrieves the image data that matches or is similar to the retrieve condition. Therefore, Dalton cannot possibly disclose or suggest a retrieval component that retrieves the image data that matches or is similar to the retrieve condition data from the image storage component connected to the connector component and an internal storage component that accumulatively stores the image data that was retrieved until there is an explicit delete instruction, even when the image storage component was detached from the connector component or was replaced with another image storage component, as featured in Claim 13.

In light of the deficiencies in Suzuki and Dalton as discussed above, Applicants submit that Claim 13 is now in condition for allowance and respectfully request same.

Independent Claims 22, 23 and 24 are directed to a method, a computer-readable storage medium and an apparatus, respectively, substantially in accordance with the imaging apparatus of Claim 13. Accordingly, Applicant submits that Claims 22, 23 and 24 are also now in condition for allowance and respectfully requests same.

The other pending claims in this application are each dependent from the independent claims discussed above and are therefore believed allowable for at least the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of each dependent claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

CONCLUSION

No claim fees are believed due; however, should it be determined that additional claim fees are required, the Director is hereby authorized to charge such fees to Deposit Account 06-1205.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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